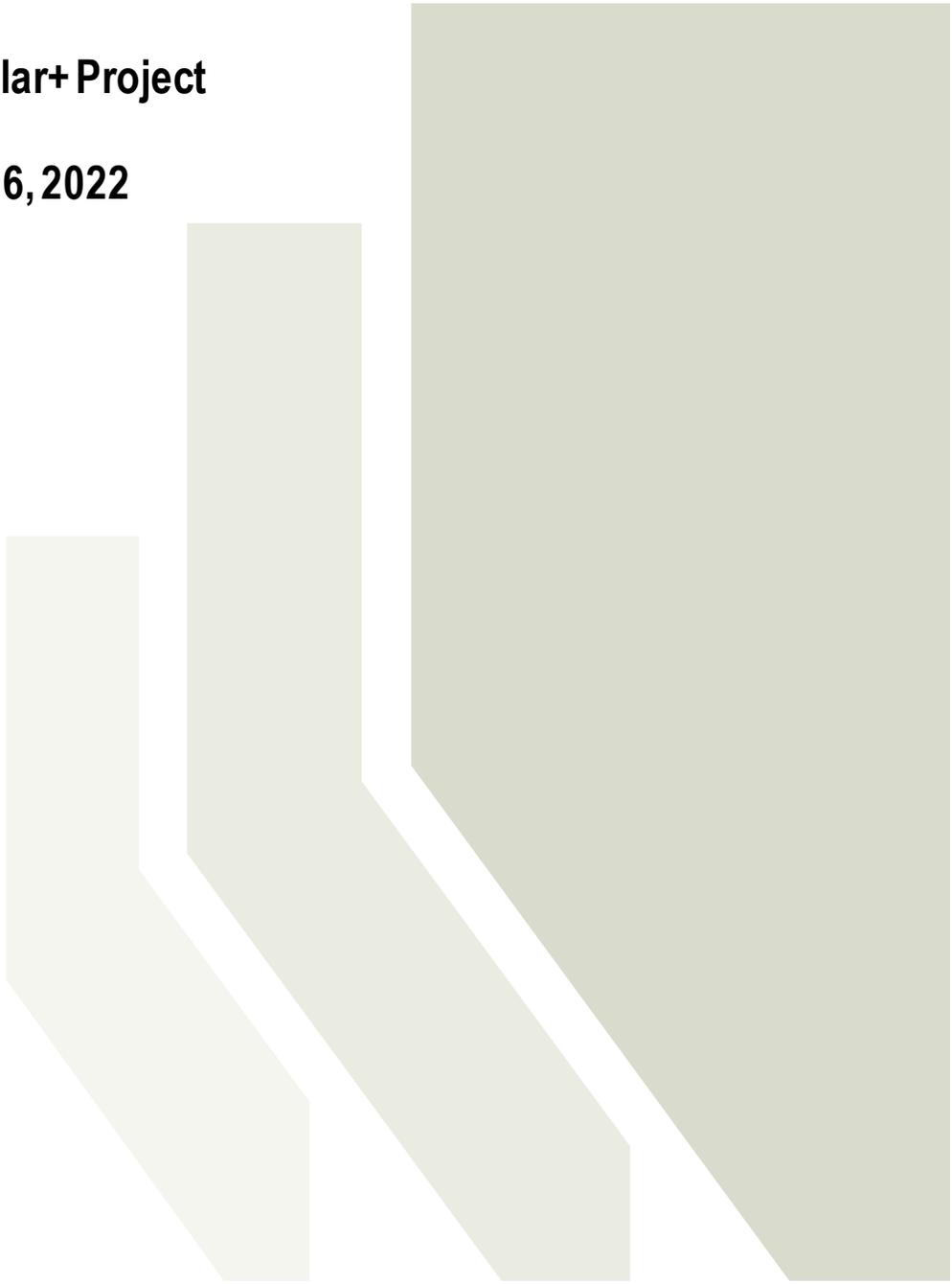




Jurassic Solar GP Ltd.

Jurassic Solar+ Project

November 16, 2022



Alberta Utilities Commission

Decision 27623-D01-2022

Jurassic Solar GP Ltd.

Jurassic Solar+ Project

Proceeding 27623

Applications 27623-A001 and 27623-A002

November 16, 2022

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1 Decision summary

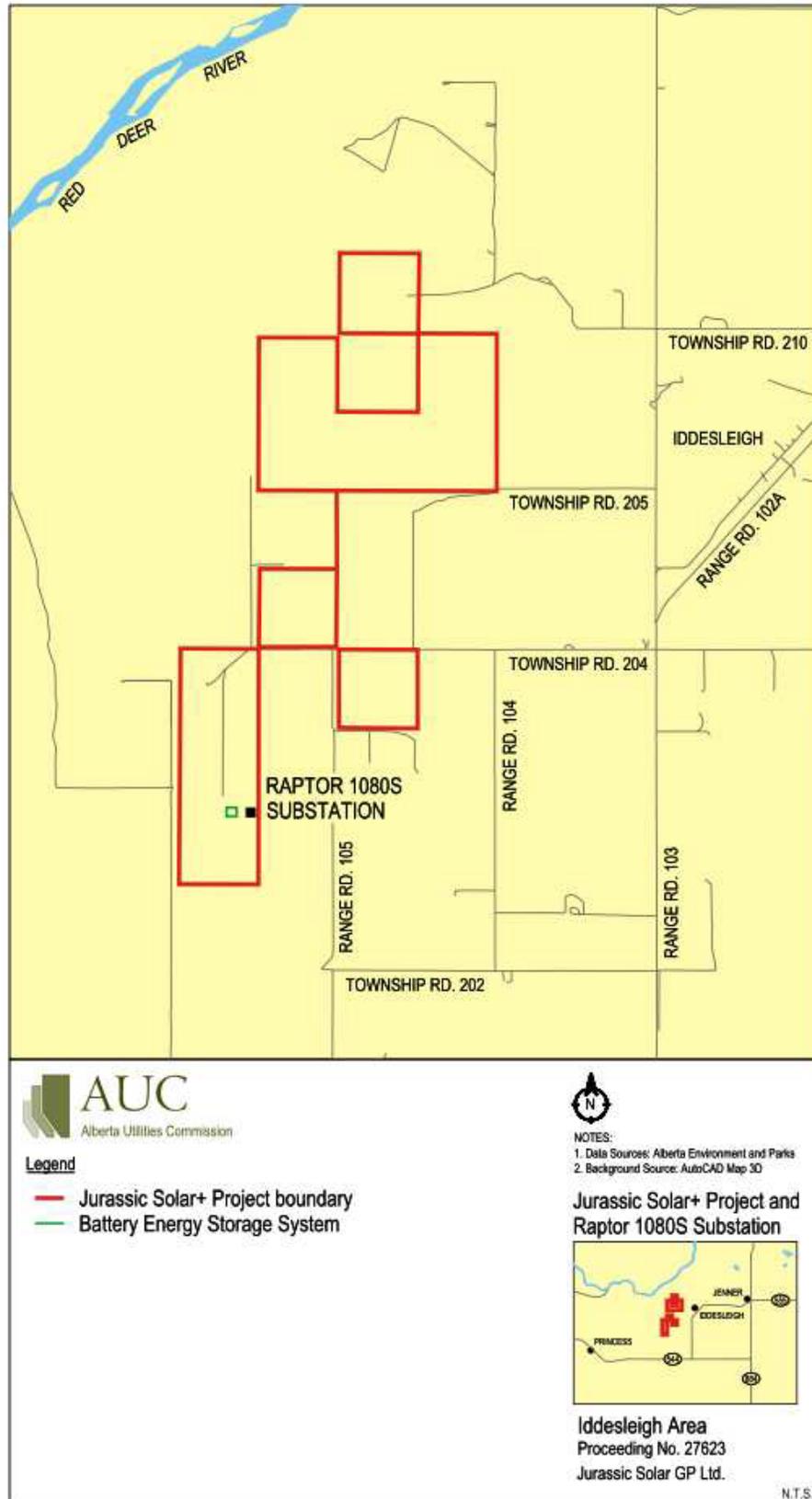
1. In this decision, the Alberta Utilities Commission approves applications from Jurassic Solar GP Ltd. (Jurassic), to construct and operate the Jurassic Solar+ Project, located near Iddesleigh in Special Area No. 2 and Cypress County. The project consists of a 220-megawatt (MW) solar power plant, a battery energy storage system with a storage capacity of up to 80-megawatt-hour (MWh) and the associated Raptor 1080S Substation.

2 Applications

2. Jurassic filed applications with the Commission for approval to construct and operate the Jurassic Solar+ Project. The solar power plant would consist of approximately 443,000 bifacial photovoltaic modules on a single-axis tracking system, 62 inverter and transformer stations, and underground collector lines that would connect to the Raptor 1080S Substation. The battery energy storage system (BESS) would utilize lithium iron phosphate batteries and be rated up to 80 MW and have a storage capacity of 80 MWh. The Raptor 1080S Substation would contain three 240/34.5-kilovolt (kV) transformers, up to four 240-kV circuit breakers, up to thirteen 34.5-kV circuit breakers, and associated substation equipment. Jurassic stated that the manufacturers and model types for the photovoltaic modules, inverter/transformer stations, main power transformers and BESS will be determined during the detailed design and optimization phase and it will notify the Commission prior to construction. Jurassic will also confirm whether the finalized design of the project is expected to increase the land, noise and environmental impacts beyond those reflected in the initial application to the Commission.

3. The project would be sited on approximately 1,170 acres of privately owned and predominately agricultural land, in Special Area No. 2 and Cypress County, within sections 18, 19, 20, 30, 31, 32 and 33 of Township 20, Range 10, west of the Fourth Meridian and the southwest quarter of Section 5, Township 21, Range 10, west of the Fourth Meridian, and as shown in the figure below. The BESS and Raptor 1080S Substation would be located in the northwest quarter of Section 18, Township 20, Range 10, west of the Fourth Meridian.

Figure 1. Jurassic Solar+ Project location



4. Separate applications will be submitted for approval to construct transmission infrastructure to connect the project to the Alberta Interconnected Electric System.
5. Jurassic's applications included:
 - A participant involvement program (PIP) summary, which details consultation with stakeholders within 400 metres of the project and notification to stakeholders within 800 metres of the project.¹
 - A copy of the renewable energy project submission filed with Alberta Environment and Parks Fish and Wildlife Stewardship (AEP),² which is specific to wildlife and wildlife habitat and describes baseline environmental conditions and associated surveys or studies; identifies potential environmental impacts from the project; and describes mitigation to prevent or limit those impacts.³ Supplemental environmental information was provided in response to AUC information requests.⁴
 - An environmental protection plan, completed by Matrix Solutions Inc., which summarizes the environmental protection measures that Jurassic commits to undertaking during the project's construction and operation.⁵
 - An environmental evaluation, completed by Matrix Solutions Inc., which predicted the project's effects on the environment, recommended measures to avoid or mitigate the project's predicted adverse environmental effects, and proposed monitoring to evaluate the efficacy of these measures.⁶
 - A conceptual conservation and reclamation plan, completed by Matrix Solutions Inc., that describes the existing baseline conditions and land use associated with the project and outlines site-specific conservation and reclamation activities that have or will be undertaken.⁷
 - The AEP renewable energy referral report, dated August 17, 2022, which ranked the project an overall moderate risk to wildlife and wildlife habitat.⁸
 - A site-specific emergency response plan for the construction and operation of the project that was provided to local responders and authorities.⁹

¹ Exhibit 27623-X0015, Attachment 14 - Participant Involvement Program Report.

² On October 24, 2022, the Ministry of Environment and Parks was renamed the Ministry of Environment and Protected Areas. Any references to AEP in Rule 033: *Post-approval monitoring requirements for wind and solar power plants* and elsewhere that relate to forward-looking obligations or commitments between the applicant and AEP should be interpreted as meaning Alberta Environment and Protected Areas.

³ Exhibit 27623-X0012, Attachment 11 - AEP Renewable Energy Project Submission.

⁴ Exhibit 27623-X0030, Jurassic Solar LP AUC Information Request Round 1 Responses.

⁵ Exhibit 27623-X0009, Attachment 8 - Environmental Protection Plan.

⁶ Exhibit 27623-X0008, Attachment 7 - Environmental Evaluation.

⁷ Exhibit 27623-X0010, Attachment 9 - Conceptual Conservation and Reclamation Plan.

⁸ Exhibit 27623-X0013, Attachment 12 - AEP Renewable Energy Referral Report.

⁹ Exhibit 27623-X0006, Attachment 5 - Emergency Response Plan.

- A solar glare assessment, completed by Green Cat Renewables Canada Corporation (GCR), which predicted that glare from the project will not create any glare for nearby dwellings or transportation routes.¹⁰
- A noise impact assessment (NIA), completed by GCR, which confirmed that the project will comply with Rule 012: *Noise Control*.¹¹

6. Jurassic expects construction to begin in the second quarter of 2023, with a commercial operation date in the third quarter of 2024. Jurassic requested a construction completion date of December 2024 to account for unforeseen delays.

7. The Commission issued a notice of applications to area stakeholders, the Blood Tribe, Piikani Nation and Siksika Nation. The Commission did not receive any statements of intent to participate in response to the notice.

3 Discussion and findings

8. The Commission has considered the applications in their entirety, and for the reasons outlined below, the Commission finds that approval of the project is in the public interest having regard to the social, economic, and other effects of the project, including its effect on the environment.

9. The Commission begins by discussing issues that are relevant to the project as a whole, including project consultation and the project's environmental and noise impacts. The Commission then discusses considerations that relate primarily to the power plant, substation, and BESS, in that order.

3.1 Considerations relevant to the project as a whole

10. The Commission considers that the information requirements specified in Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines* have been met.

11. Jurassic's PIP consisted of notification to stakeholders, including occupants, residents, and landowners located within 800 metres of the project boundary, and personal consultation with stakeholders located within 400 metres of the project boundary. There are no aerodromes within 4,000 metres of the project. Jurassic also held a virtual community public open house. The PIP provided stakeholders with an opportunity to be informed of the project and provide feedback. Jurassic consulted with the Siksika Nation, Piikani Nation and Blood Tribe. No specific concerns were raised about the project.

12. Jurassic consulted with Cypress County and Special Area No. 2. No questions or concerns were raised by Cypress County. Jurassic will continue to engage with Special Area No. 2 representatives regarding road upgrade and maintenance requirements, setbacks and setback reductions, and crossing requirements. Jurassic will submit a development permit

¹⁰ Exhibit 27623-X0007, Attachment 6 - Solar Glare Hazard Assessment.

¹¹ Exhibit 27623-X0011, Attachment 10 - Noise Impact Assessment.

application with Special Area No. 2 following the Commission's process. The Commission finds that Jurassic's PIP has satisfied the requirements of Rule 007.

13. The Commission accepts AEP's assessment that the project presents an overall moderate risk to wildlife and wildlife habitat. AEP's high risk to birds was determined based on the general siting of the project within an area of high avian use including avian species at risk (SAR), project interactions with native grassland/wetland habitat and solar panels on modified grassland. The breeding bird survey detected eight SAR in low to high abundance and the migratory bird surveys detected four SAR species in low abundance. While the project is located within the sensitive amphibian range, sensitive raptor range, burrowing owl range, sharp-tailed grouse range, and sensitive snake hibernacula range, the project adheres to the relevant setbacks determined during field surveys and outlined in the environmental evaluation.

14. Two access roads and three collector lines are sited on native grassland habitat. Jurassic submitted that horizontal directional drilling would be used for the three collector lines to limit impacts to native habitat. Other mitigation measures for the project include using rig matting when constructing external access roads and during operations in wet conditions, and leaving access roads non-graveled. Jurassic submitted that the siting of access roads on native grasslands was necessary to meet ingress and egress safety requirements and allow unobstructed access in and out of the site. It added that alternate access was considered, however, those required substantial upgrades resulting in additional soils and vegetation disturbance. Other route options would straddle native grasslands for longer lengths, impact seasonal wetlands, were in closer proximity to residences or included the presence of historical resources. Jurassic submitted that the selected access road route is along an existing access and is heavily impacted by cattle use. The Commission finds that the siting of project infrastructure on native grasslands (totalling 0.12 hectares) is justified in this instance because it has the lowest overall impact and is intended to provide safe access to the site.

15. Jurassic committed to undertake construction of project infrastructure outside of the grassland breeding bird season in native grassland, modified pasture habitats and wetland habitat. Jurassic also committed to performing nest sweeps prior to construction during the breeding bird season in other non-cultivated habitats within the project footprint.

16. The Commission is satisfied that, with diligent implementation of the mitigation measures and adherence to the commitments made by Jurassic in this proceeding, the identified environmental effects of the project can be mitigated to an acceptable degree. The project area is located primarily on cultivated lands. No Class III+ wetlands will be infringed upon by the project. No project infrastructure is sited within the 100-metre setback of seasonal wetlands, with the exception of one collector line sited through a Class III marsh and Jurassic has committed to utilizing horizontal directional drilling to install the collector line. In addition, project construction will occur outside of the amphibian breeding period and no great plains toads were detected. The Commission finds that the potential for the project to impact wetlands can be adequately mitigated.

17. Rule 033: *Post-approval Monitoring Requirements for Wind and Solar Power Plants* requires approval holders to submit annual post-construction monitoring survey reports to AEP and the Commission. Therefore, the Commission imposes the following condition of approval:

- a. Jurassic Solar GP Ltd. shall submit an annual post-construction monitoring report to Alberta Environment and Protected Areas – Fish and Wildlife Stewardship and the Commission no later than January 31 of the year following the mortality monitoring period, and on or before the same date every subsequent year for which Alberta Environment and Protected Areas requires surveys pursuant to subsection 3(3) of Rule 033: *Post-approval Monitoring Requirements for Wind and Solar Power Plants*.

18. The NIA identified three dwellings (R1 to R3) within 1.5 kilometres of the project property boundary as receptors, and established permissible sound levels (PSLs) to be 40 A-weighted decibels (dBA) nighttime and 50 dBA daytime at all receptors. Major sound sources of the project modelled in the NIA include 62 inverter/transformer stations at the solar power plant, 243 energy storage battery racks and 21 inverter/transformers stations at the project BESS, and three 240/34.5-kV, 139-megavolt ampere high-voltage transformers at the project substation. The NIA established sound power levels of the project sound sources based on manufacturer or vendor data, and predicted that cumulative sound levels will be compliant with applicable PSLs at all receptors.

19. The Commission finds that the NIA meets the requirements of Rule 012 and accepts the conclusion that noise from the project will comply with that rule.

20. The Commission finds that Jurassic has adequately considered the decommissioning and reclamation activities that will be required at the end of the project's life, including its obligations under the *Conservation and Reclamation Regulation*. The conceptual conservation and reclamation plan will be updated throughout the project's life until a reclamation certificate has been obtained. In addition to its reclamation obligations under provincial legislation, Jurassic stated it has a contractual obligation with landowners to remove all project infrastructure from the lands. Funding to cover the costs of decommissioning and reclamation will be provided through performance security in the form of either a cash bond, letter of credit, or corporate/paternal guarantee.

21. The Commission notes that an amended *Historical Resources Act* application was submitted for the project and that an archaeological historical resource impact assessment is required. Jurassic shall obtain a *Historical Resources Act* approval for the project lands prior to the start of construction.

3.2 Considerations specific to the power plant

22. The solar glare assessment identified a dwelling (D1) within 800 metres of the project boundary, and three local roads (Township Road 203A, Township Road 204 and Range Road 104) as receptors. The solar glare assessment indicated that the project's solar panels would be mounted on a single-axis tracking system with a maximum tracking angle of 60 degrees, and assumed that the project would use anti-reflective coating on the solar panels. The assessment predicted that receptors are not expected to experience any glare from the project.

23. As the predictions and associated conclusion in the solar glare assessment were premised upon the use of an anti-reflective coating, the Commission imposes the following condition of approval:

- Jurassic Solar GP Ltd. shall use anti-reflective coating on the project solar panels.

24. Given the predictions from the glare assessment, the Commission is satisfied that the glare impacts from the project will be minimal. However, the Commission requires Jurassic to promptly address complaints or concerns from stakeholders regarding solar glare if Jurassic receives any at the post-construction stage. Accordingly, the Commission imposes the following condition of approval:

- Jurassic Solar GP Ltd. shall file a report with the Commission detailing any complaints or concerns it receives or is made aware of regarding solar glare from the project during its first year of operation, as well as its response to the complaints or concerns. Jurassic Solar GP Ltd. shall file this report no later than 13 months after the project becomes operational.

25. Jurassic stated that the final selection of the photovoltaic solar modules will be made prior to construction, based on the required electrical characteristics and economic aspects of available modules at the time of procurement. As such, the Commission imposes the following condition to ensure the final equipment does not result in impacts greater than those considered in this application. Should the final equipment result in greater impacts, Jurassic must submit an amendment application to the Commission for consideration:

- Once Jurassic Solar GP Ltd. has finalized its equipment selection for the photovoltaic power plant it must file a final project update to the Commission to confirm that the project has stayed within the final project update specified allowances for solar power plants. The final project update must be filed at least 90 days prior to the start of construction.

3.3 Considerations specific to the substation

26. The Commission finds that impacts from the construction and operation of the substation will be minor in nature. The footprint of the substation is within the project boundary, which the Commission considered in its assessment of the solar power plant. Further, the NIA concluded that the substation will operate in compliance with Rule 012.

27. The Commission notes that the substation will contain one telecommunications tower; however, Jurassic has stated this is outside of the scope of this application and will be subject to a separate regulatory process. As Jurassic has not finalized all of the substation components, specifically the quantity of 240-kV and 34.5-kV circuit breakers, the Commission imposes the following condition to confirm the final substation equipment:

- Once Jurassic Solar GP Ltd. has finalized its equipment selection for the substation, it must submit a final project update to the AUC confirming quantity and rating of the circuit breakers. The final project update must be filed at least 90 days prior to the start of construction of the substation.

3.4 Considerations specific to the battery energy storage system

28. Jurassic's proposed BESS will be rated at 80 MW with a storage capacity of 80 MWh. The BESS is proposed to consist of 243 Trina containers of lithium iron phosphate batteries and 21 inverter/transformers stations. Jurassic has not selected the battery vendor so specifications are subject to change.

29. The Commission considered the noise and environmental impacts of the BESS in its consideration of the project as a whole, and finds that impacts from the construction and operation of the BESS will be minor in nature.

30. The Commission understands that the use of lithium iron phosphate¹² batteries mitigates some safety concerns related to battery technology because the materials in a lithium iron phosphate battery are thermally and structurally stable chemical compounds that are less prone to thermal runaway than those in other types of lithium-ion batteries. Jurassic submitted that the BESS will contain an automated control and monitoring system and that each battery cell will be equipped with a temperature sensor. Jurassic submitted that the BESS monitoring system and safety features will be confirmed once the BESS equipment is finalized.

31. Given the battery vendor and the monitoring system remain to be confirmed, the Commission imposes the following condition of approval:

- Jurassic Solar GP Ltd. shall select lithium iron phosphate batteries for the BESS. If an alternate battery chemistry is selected, Jurassic Solar GP Ltd. shall submit specifications such as the cell combustion phase duration and peak temperature to the Commission, along with confirmation the alternate chemistry possesses better thermal stability than lithium iron phosphate. Jurassic shall also confirm the BESS monitoring equipment. Jurassic Solar GP Ltd. cannot proceed with construction of the BESS until it receives written approval from the Commission.

32. Jurassic retained Calvin Consulting Group Ltd. to conduct an air quality dispersion modelling and risk assessment for the BESS. The modelling assumed a worst-case scenario where a fire would occur in the container closest to the nearest residence, which is approximately 1.3 kilometres north of the BESS. It was assumed that 10 per cent of the batteries in any one module would burn simultaneously until such time as all modules in a container have burned. The report stated it is highly unlikely for the fire to spread to other containers. The report modelled the dispersion of hydrogen fluoride (HF) and carbon monoxide (CO) and found that the predicted concentrations for HF and CO exceed their respective *Alberta Ambient Air Quality Objectives* (AAAQOs) at the BESS fenceline; however, this dissipated with distance and meets the AAAQOs at 250 metres from the BESS. At the nearest residence the predicted concentrations were well below the respective AAAQOs.¹³

33. The air quality dispersion modelling assessment also compared the HF and CO concentrations with the American National Institute for Occupational Safety and Health's (NIOSH) Immediately Dangerous to Life or Health (IDLH) values. The maximum predicted

¹² Lithium iron phosphate batteries are a type of lithium-ion battery which use iron phosphate as the cathode. They are also referred to as LFP batteries or LiFePO₄.

¹³ At the nearest residence, HF was predicted to be 0.15 µg/m³ with an AAAQO of 4.9 µg/m³ and CO was predicted to be 436.3 µg/m³ with an AAAQO of 15000 µg/m³.

10-minute average concentrations for HF and CO were below the IDLH values at all off-site locations.¹⁴ The report concluded that the risk to the public and local residents is low given the safety features of the BESS, low probability of fires using the lithium iron phosphate chemistry, and the predicted air quality concentrations of HF and CO in the event of a fire.

34. The Commission finds that with monitoring systems and safety features built into the BESS, the safety risk of the BESS is low; however, the Commission notes that BESS components have not been finalized. The Commission imposes the following condition of approval to ensure that potential emissions impacts are considered:

- Upon final equipment selection of the BESS, Jurassic Solar GP Ltd. shall confirm the findings of the air quality dispersion modelling and risk assessment remain valid and continue to meet the *Alberta Ambient Air Quality Objectives* and the American National Institute for Occupational Safety and Health's Immediately Dangerous to Life or Health (IDLH) values at the nearest residence.

35. Jurassic's emergency response plan considers the BESS and summarizes information for first responders to safely and effectively respond to incidents that involve the BESS and Jurassic has committed to keeping emergency responders informed and engaged in emergency response planning. Jurassic has also committed to provide on-site training by a qualified third party to all emergency responders who may be required to respond to any BESS related emergencies at the project site. While the Commission considers that iterative, site-specific emergency response plans and training are important tools to prepare for and respond to emergency incidents, the Commission also understands that not all emergency risks can be mitigated. Accordingly, the Commission imposes the following conditions of approval:

- Jurassic Solar GP Ltd. shall continually review and update its site-specific emergency response plan, and make any changes required to incorporate input received from local fire departments on mitigation measures and other related requirements, and from Cypress County, Special Area No. 2 and other interested stakeholders. The updated plans are to be provided to Cypress County, Special Area No. 2 and local fire departments.
- Jurassic Solar GP Ltd., and any subsequent operator, shall at all times during the construction and operation of the project, maintain insurance coverage that is sufficient to protect against any reasonably foreseeable liabilities.
- Jurassic Solar GP Ltd., and any subsequent operator, shall implement any ongoing upgrades to improve the safety of the project, including but not limited to firmware and software enhancements, monitoring capability enhancement, process changes and safety standards as they are developed.

36. In light of the foregoing, and subject to the conditions set out in this decision and commitments undertaken by Jurassic, the Commission considers the applications to be in the public interest in accordance with Section 17 of the *Alberta Utilities Commission Act*.

¹⁴ At 100 metres for the BESS, HF was predicted to be 0.2020 parts per million (ppm) with an IDLH limit of 30 ppm and CO was predicted to be 12.7 ppm with an IDLH limit of 1,200 ppm.

4 Decision

37. Pursuant to sections 11 and 19 of the *Hydro and Electric Energy Act*, the Commission approves Application 27623-A001 and grants Jurassic Solar GP Ltd., the approval set out in Appendix 1 – Power Plant Approval 27623-D02-2022 to construct and operate the solar power plant and battery energy storage system.

38. Pursuant to sections 14, 15 and 19 of the *Hydro and Electric Energy Act*, the Commission approves Application 27623-A002 and grants Jurassic Solar GP Ltd., the approval set out in Appendix 2 – Substation Permit and Licence 27623-D03-2022 to construct and operate the Raptor 1080S Substation.

39. The appendices will be distributed separately.

Dated on November 16, 2022.

Alberta Utilities Commission

(original signed by)

Renée Marx
Commission Member

Appendix A – Summary of Commission conditions of approval in the decision

This section is intended to provide a summary of all conditions of approval specified in the decision for the convenience of readers. Conditions that require subsequent filings with the Commission will be tracked as directions in the AUC's eFiling System. In the event of any difference between the conditions in this section and those in the main body of the decision, the wording in the main body of the decision shall prevail.

The following are conditions of Decision 27623-D01-2022 that require subsequent filings with the Commission and will be included as conditions of Power Plant Approval 27623-D02-2022:

- Jurassic Solar GP Ltd. shall submit an annual post-construction monitoring report to Alberta Environment and Protected Areas – Fish and Wildlife Stewardship and the Commission no later than January 31 of the year following the mortality monitoring period, and on or before the same date every subsequent year for which Alberta Environment and Protected Areas requires surveys pursuant to subsection 3(3) of Rule 033: *Post-approval Monitoring Requirements for Wind and Solar Power Plants*.
- Once Jurassic Solar GP Ltd. has finalized its equipment selection for the photovoltaic power plant it must file a final project update to the Commission to confirm that the project has stayed within the final project update specified allowances for solar power plants. The final project update must be filed at least 90 days prior to the start of construction.
- Jurassic Solar GP Ltd. shall select lithium iron phosphate batteries for the BESS. If an alternate battery chemistry is selected, Jurassic Solar GP Ltd. shall submit specifications such as the cell combustion phase duration and peak temperature to the Commission, along with confirmation the alternate chemistry possesses better thermal stability than lithium iron phosphate. Jurassic shall also confirm the BESS monitoring equipment. Jurassic Solar GP Ltd. cannot proceed with construction of the BESS until it receives written approval from the Commission.
- Upon final equipment selection of the BESS, Jurassic Solar GP Ltd. shall confirm the findings of the air quality dispersion modelling and risk assessment remain valid and continue to meet the *Alberta Ambient Air Quality Objectives* and the American National Institute for Occupational Safety and Health's Immediately Dangerous to Life or Health (IDLH) values at the nearest residence.

The following is a condition of Decision 27623-D01-2022 that requires a subsequent filing with the Commission and will be included as a condition of Substation Permit and Licence 27623-D03-2022:

- Once Jurassic Solar GP Ltd. has finalized its equipment selection for the substation, it must submit a final project update to the AUC confirming quantity and rating of the circuit breakers. The final project update must be filed at least 90 days prior to the start of construction of the substation.

The following are conditions of Decision 27623-D01-2022 that may or do not require subsequent filings with the Commission and will be included as conditions of Power Plant Approval 27623-D02-2022:

- Jurassic Solar GP Ltd. shall use anti-reflective coating on the project solar panels.
- Jurassic Solar GP Ltd. shall file a report with the Commission detailing any complaints or concerns it receives or is made aware of regarding solar glare from the project during its first year of operation, as well as its response to the complaints or concerns. Jurassic Solar GP Ltd. shall file this report no later than 13 months after the project becomes operational.
- Jurassic Solar GP Ltd. shall continually review and update its site-specific emergency response plan, and make any changes required to incorporate input received from local fire departments on mitigation measures and other related requirements, and from Cypress County, Special Area No. 2 and other interested stakeholders. The updated plans are to be provided to Cypress County, Special Area No. 2 and local fire departments.
- Jurassic Solar GP Ltd., and any subsequent operator, shall at all times during the construction and operation of the project, maintain insurance coverage that is sufficient to protect against any reasonably foreseeable liabilities.
- Jurassic Solar GP Ltd., and any subsequent operator, shall implement any ongoing upgrades to improve the safety of the project, including but not limited to firmware and software enhancements, monitoring capability enhancement, process changes and safety standards as they are developed.